

TOWNSEND AND TOWNSEND AND CREW LLP  
MARC M. GORELNIK (State Bar No. 166833)  
MARY L. SHAPIRO (State Bar No. 201199)  
Two Embarcadero Center, Eighth Floor  
San Francisco, California 94111  
Telephone: (415) 576-0200  
Facsimile: (415) 576-0300  
Email: mmgorelnik@townsend.com  
mlshapiro@townsend.com

Attorneys for Plaintiff  
WIND OF TRADE LLC

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

WIND OF TRADE LLC, a Nevada limited  
liability company,

Plaintiff,

v.

MOSTAG INTERNATIONAL, INC., a  
Pennsylvania corporation,

Defendant.

Case No. CV 07 06280 MMC

**DECLARATION OF MARC M.  
GORELNIK IN SUPPORT OF  
REQUEST FOR ENTRY OF  
DEFAULT**

I, Marc M. Gorelnik, declare:

1. I am a partner of the law firm of Townsend and Townsend and Crew LLP, the attorneys for plaintiff Wind of Trade LLC ("Plaintiff") in this case, and am duly licensed to practice in the State of California. I submit this Declaration in Support of Request For Entry of Default against defendant Mostag International, Inc. ("Defendant"). The following facts are within my personal knowledge and I could and would be competent to testify to them if called as a witness in this matter.

2. Attached hereto as Exhibit A is a true and correct copy of the Proof of Service of the Summons, Complaint, and other papers in the action. Defendant has not responded to the Complaint.

3. Plaintiff filed the Return of Summons on December 13, 2007. See Docket No. 12.

4. Attached hereto as Exhibit B is a true and correct copy of my January 4, 2008 correspondence to defendant that indicated that default would be taken if defendant failed to respond

1 to the Complaint.

2 5. On information and belief, Defendant is not an infant or incompetent person and is not  
3 a person in military service or otherwise exempt from default judgment under the Soldiers and Sailors  
4 Civil Relief Act of 1940.

5 I declare under the penalty of perjury under the laws of the State of California that the  
6 foregoing is true and correct.

7 EXECUTED this 14th day of January, 2008, at San Francisco, California.

8  
9  
10 /s/  
MARC M. GORELNIK

**PROOF OF SERVICE**

I am over the age of eighteen years and not a party to this action. My business address is Two Embarcadero Center, 8th Floor, San Francisco, California 94111.

On January 14, 2008, I served a copy of the foregoing document:

**DECLARATION OF MARC M. GORELNIK IN SUPPORT  
OF REQUEST FOR ENTRY OF DEFAULT**

( X ) (VIA FIRST CLASS MAIL) I am employed in the County where the mailing described below occurred, and am readily familiar with the business practice for collection and processing of correspondence for mailing with the United States Postal Services. I placed a true copy thereof to which was attached a copy of this document(s) in a sealed envelope(s) with postage thereon fully prepaid addressed as listed below. The envelope(s) will be deposited with the United States Postal Service on this day in the ordinary course of business in San Francisco, California, following ordinary business practices.

( X ) (VIA FACSIMILE) I caused such document(s) to be delivered by facsimile to the facsimile number(s) listed below.

Mostag International  
1025 A Washington Avenue  
Croydon, PA 19021  
*Facsimile: (215) 781-6606*

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

EXECUTED on January 14, 2008 at San Francisco, California.

/s/

Billie Raney